

1 JULIE A. MERSCH, ESQ.  
Nevada Bar No. 004695  
2 LAW OFFICE OF JULIE A. MERSCH  
701 S.7th Street  
3 Las Vegas, NV 89101  
4 (702) 387-5868  
Fax: (702) 387-0109  
5 [jam@merschlaw.com](mailto:jam@merschlaw.com)  
6 *Attorney for Plaintiff*

7 Georlen Spangler, Esq.  
Nevada Bar No. 3818  
8 LAW OFFICE OF GEORLEN K. SPANGLER  
2620 Regatta Drive, Suite 102  
9 Las Vegas, Nevada 89128  
Phone: 702.381.5830  
10 E-Mail: [spanglerlaw@outlook.com](mailto:spanglerlaw@outlook.com)  
11 *Attorneys for Defendant*

12 ***Admitted Pro Hac Vice***  
Iwana Rademaekers, TX Bar No. 16452560  
13 LAW OFFICES OF IWANA RADEMAEKERS, P.C.  
14 14785 Preston Road, Suite 550  
Dallas, Texas 75254  
15 Main: (214) 579-9319  
Fax: (469) 444-6456  
16 Email: iwana@rademaekerslaw.com  
17 *Attorneys for Defendant*

18 **UNITED STATES DISTRICT COURT**  
19 **DISTRICT OF NEVADA**

20 TATIANA BUSHEE,  
21 Plaintiff,  
22 v.

23 LIBERTY LIFE ASSURANCE  
24 COMPANY OF BOSTON as Claims  
Administrator for the Safeway, Inc. Group  
25 Disability Income Plan; DOES I through  
26 V; and ROE CORPORATIONS I through  
V, inclusive,  
27 Defendant.

Case No. 2:18-CV-00804-GMN-VCF

**STIPULATION AND ORDER TO  
EXTEND CERTAIN DEADLINES**

**FIRST REQUEST**

1 IT IS HEREBY STIPULATED by the parties hereto, by and through their undersigned  
2 counsel that, pursuant to LR 26-4, certain deadlines entered by the Court during the Hearing on  
3 July 5, 2018, be amended as follows:

4  
5 Certain documents were requested by Plaintiff to be added to the Administrative Record.  
6 Defendant does not object to the inclusion of these additional documents to the Record and  
7 Defendant's counsel is in the process of obtaining these documents and requires additional time  
8 to do so. As such, the Parties are unable to file a complete Administrative Record at this time.  
9 Additionally, until such time as Plaintiff can review these additional documents being gathered  
10 by Defendant, the Parties cannot make an accurate representation to the court in their Joint  
11 Statement regarding unresolved issues. Accordingly, the parties request the following revisions  
12 to the current schedule:

13 **PROPOSED SCHEDULE**

<b><u>Deadline</u></b>	<b><u>Current</u></b>	<b><u>Proposed</u></b>
Last day to file Joint Administrative Record	<b>Aug. 29, 2018</b>	<b>Sept. 4, 2018</b>
Last day to file Joint Statement	<b>Aug. 29, 2018</b>	<b>Sept. 4, 2018</b>

16 We, the undersigned, agree to the proposed scheduling as indicated above. We, the  
17 undersigned, also represent to the Court that we are working together cooperatively and in good  
18 faith to resolve the issues described above. The extension of these deadlines will not affect any  
19 other deadlines previously set by the Court.

20 DATED this 29<sup>th</sup> day of August 2018.

21 LAW OFFICE OF JULIE A. MERSCH

LAW OFFICES OF IWANA  
RADEMAEKERS, P.C.

22  
23  
24 /s/ Julie A. Mersch  
25 Julie A. Mersch, Nevada Bar No. 004695  
26 701 S.7th Street  
27 Las Vegas, NV 89101  
28 Email: [jam@merschlaw.com](mailto:jam@merschlaw.com)

/s/ Iwana Rademaekers  
Iwana Rademaekers, TX Bar No. 16452560  
***Admitted Pro Hac Vice***  
14785 Preston Rd, Suite 550  
Dallas, Texas 75254

*Attorneys for Plaintiff*

- AND -

LAW OFFICE OF GEORLEN K.  
SPANGLER

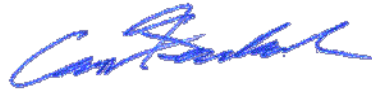
/s/ Georlen Spangler

Georlen Spangler, Nevada Bar No. 3818  
2620 Regatta Drive, Suite 102  
Las Vegas, Nevada 89128  
Phone: 702.381.5830

*Attorneys for Defendant Liberty Life  
Assurance Company of Boston*

**ORDER**

IT IS SO ORDERED August 30, 2018.



United States Magistrate Judge